



Reynolds Media Inc.



The idea as a whole that was conceived and implemented by FCC visionaries adopting LPTV status in areas not fully serviced by high-powered television stations is at a crossroads. That vision and support should continue long after the digital conversion of all TV stations have ended. Low-Power TV stations serve a valuable role in bringing a sense of local community to specific areas of the country that don't always receive adequate information about their local area. LPTV stations do an excellent job of this.

This will not likely be the last time in the history of broadcasting that technology, channel displacement, secondary status, or other unforeseen roadblock will create chaos in the television broadcast arena. That's why it is so important that LPTV stations and operators, if serving the communities they are licensed to, have the ongoing right to be recognized as a legitimate outlet representing the moral goals, rules, and bylaws of the Federal Communications Commission and be considered equal and as important as our high-powered counterparts.

If all of us, both high power and low-power TV operators are held accountable under the FCC rules, regulations and what they represent, LPTV stations and operators should be given every right and opportunity to fully participate in the digital transition and fair digital channel placement that will ensure our continued presence in the communities we serve, the opportunity to build upon that foundation to thrive as a community-based business without unfair restrictions from unfair laws, and corporate big business.

Furthermore, a secondary status for LPTV stations should have no bearing or merit in respect to the digital conversion process. We should not be shoved aside or take a back seat in this matter. There is room for all and LPTV should be offered the same consideration and equal channel placement as the "big boys" based on the community numbers they serve.

To that end, all new digital LPTV stations should be assured of permanent and unconditional primary status in this phase and all future transitions whatever they may be.

All of the LPTV community understand the FCC's limitations on maximum power and rightly so that should continue to be regulated by the FCC. However the power limits proposed by the NPRM may not be adequate. LPTV stations should not be restricted with regulations that will restrict our ability to thrive as a successful business in the communities we are licensed to serve in. Allow us the same freedom and opportunity to make an impact in our coverage area and prosperous at the same time.

Finally, during this digital transition phase, all LPTV stations should have the opportunity and right to acquire a second channel for their digital television broadcasts.

Thank You for your consideration.

Dan Reynolds
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